

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

AMO DEVELOPMENT, LLC,)	
AMO MANUFACTURING USA,)	
LLC, and AMO SALES AND)	
SERVICE, INC.,)	
)	
Plaintiffs,)	
)	
v.)	C.A. No. 20-842-CFC
)	
ALCON LENSX, INC., ALCON)	
VISION, LLC, ALCON)	
LABORATORIES, INC., and)	
ALCON RESEARCH, LLC,)	
)	
Defendants.)	

DEFENDANTS' MOTION TO DISMISS UNDER RULE 12(b)(6)

Defendants Alcon LenSx, Inc., Alcon Vision, LLC, Alcon Laboratories, Inc. and Alcon Research, LLC (collectively, "Defendants") respectfully move to dismiss Plaintiffs AMO Development, LLC, AMO Manufacturing USA, LLC, and AMO Sales and Service, Inc.'s (collectively, "Plaintiffs") First Amended Complaint under Federal Rule of Civil Procedure 12(b)(6). The grounds for this Motion are fully set forth in Defendants' Opening Brief in Support of this Motion.

NOW, THEREFORE, Defendants respectfully request the Court to enter the attached Order granting this Motion and dismissing with prejudice Plaintiffs' claims for contributory infringement under 35 U.S.C. § 271(c), Plaintiffs' claims for

induced infringement under 35 U.S.C. § 271(b) that pre-date Plaintiffs' notice letters, Plaintiffs' claims for infringement under 35 U.S.C. § 271(f), and Plaintiffs' claims for enhanced damages under 35 U.S.C. § 284 based on willful infringement.

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/s/ John W. Shaw

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